

EXHIBIT B

DECLARATION OF JASON CARDIFF

I, Jason Cardiff, declare as follows:

1. I am a party in the above-entitled action. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein. I make this declaration in support of Jason Cardiff's Motion to Dismiss Counts 3 and 4 of the Indictment.

2. This declaration is submitted under the protections of *Simmons v. United States*, 390 U.S. 377 (1968) and the United States Constitution. Pursuant to *Simmons* and my constitutional rights, I would object to the use of this declaration for any purpose beyond the Court's adjudication of my Motion to Dismiss Indictment with Prejudice.

3. I have reviewed the Motion and Memorandum in Support of Motion to Dismiss Counts 3 and 4 of the Indictment concurrently filed by counsel on my behalf and verify the Statement of Facts appearing at pages 6-18, which is consistent with my recollection of events.

4. At no time during the CID process was I aware of pending or current litigation with the FTC until I was served with a copy of the FTC Complaint on October 12, 2018.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 2nd day of December, 2024, at Dublin Ireland.



Jason Cardiff

DECLARATION OF JASON CARDIFF

I, Jason Cardiff, declare as follows:

1. I am a party in the above-entitled action. I have personal knowledge of the facts set forth herein. If called as a witness, I could and would competently testify to the matters stated herein. I make this declaration in support of Jason Cardiff's Motion to Dismiss Counts 3 and 4 of the Indictment.

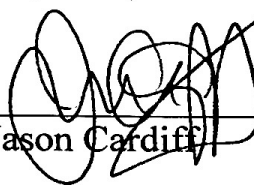
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Jason Cardiff